

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)
Law Offices of Mark W. Ford, LLC
4 ½ North Broadway, PO Box 110
Gloucester City, NJ 08030
856-456-8811/856-456-8558 (Fax)
Attorney for the debtor

In Re:

Rodney Jose Kelly

Case Number: 16-11256 MBK

Hearing Date: May 21, 2018

Judge: Michael B. Kaplan

Chapter: 13

Recommended Local Form: Followed Modified

NOTICE OF MOTION FOR VOLUNTARY DISMISSAL

To: Albert Russo
Standing Chapter 13 Trustee
CN 4853
Trenton, NJ 08650-4853

And attached List of Creditors

PLEASE TAKE NOTICE that on the 21st day of May, 2018 or as soon as counsel may be heard, attorney, for debtors shall apply to the above named court for an Order Dismissing Rodney Jose Kelly, Case number 16-11256 MBK

If you do not want the court to Dismiss the Debtors' Case, then on or before May 14, 2018, you or your lawyer must:

- A. File with the court a written request for a hearing, or if the court *requires a written response*, an answer, explaining your position at:

Clerk, United States Bankruptcy Court
U.S. Post Office & Courthouse Building
PO Box 2067
Camden, NJ 08101-2067

If you mail your request to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

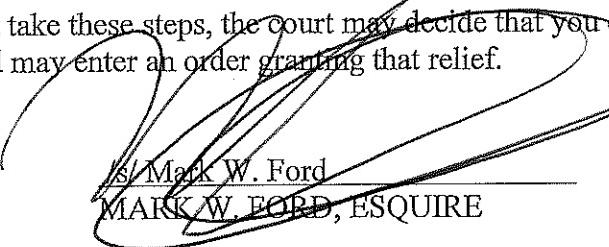
You must also mail a copy to:

Mark W. Ford, Esquire
Law Offices of Mark W. Ford, LLC
P.O. Box 110
Gloucester City, New Jersey 08030; and

Albert Russo
Standing Chapter 13 Trustee
CN 4853
Trenton, NJ 08650-4853

B. Attend the hearing scheduled to be held on May 21, 2018, at 10:00 a.m. in Courtroom 8, United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.


S/ Mark W. Ford
MARK W. FORD, ESQUIRE

Dated: April 21, 2018

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(e)
Law Offices of Mark W. Ford, LLC
4 ½ North Broadway, PO Box 110
Gloucester City, NJ 08030
856-456-8811
856-456-8558 (Fax)
Attorney for the debtor

In Re:

Rodney Jose Kelly

Case Number: 16-11256 MBK

Hearing Date:

Judge:

Chapter:

Michael B. Kaplan
Judith H. Wizmur

13

Recommended Local Form: Followed Modified

**DEBTOR'S CERTIFICATION IN SUPPORT OF VOLUNTARY
DISMISSAL OF CHAPTER 13 BANKRUPTCY**

Rodney Jose Kelly, of full age, upon his oath deposes and says:

1. I am the debtor in the above-captioned matter and have personal knowledge of the facts stated herein.
2. The bankruptcy stay has been lifted and the creditor, Mortgage Company has been allowed to proceed with foreclosure.
3. The sole purpose of the bankruptcy was to stop the foreclosure.
4. I am respectfully requesting that the court dismiss my current bankruptcy

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: March 31, 2018

/s/ Rodney Jose Kelly
Rodney Jose Kelly

Rodney Jose Kelly
04-12-2018

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Law Offices of Mark W. Ford, LLC
4 ½ North Broadway, PO Box 110
Gloucester City, NJ 08030
856-456-8811/856-456-8558 (Fax)
Attorney for the Debtor

In Re:

Rodney Jose Kelly

Case No.: 16-11256

Chapter: 13

Hearing Date: May 21, 2018

Judge: Michael B. Kaplan

ORDER ON MOTION/APPLICATION TO DISMISS/CONVERT CHAPTER 13 CASE

The relief set forth on the following pages, numbered two (2) through three (3) is **ORDERED**.

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This matter having come before the Court on Motion/Application of
Rodney Jose Kelly, for an Order Dismissing/Converting Debtor's case, and good
cause having been shown, it is hereby

ORDERED as follows:

- case is dismissed.
- case is converted to a proceeding under Chapter 7.
- case is converted to a proceeding under Chapter 11.
- case is allowed to continue under Chapter 13 upon the following terms and conditions:
 - (a) payments to the Trustee shall continue in the amount of _____ dollars/month for an additional _____ months;
 - (b) Debtor(s) shall prepare and file with the Court a Wage Order for continuing Trustee payments;
 - (c) If the Debtor(s) fail to make regular plan payments to the Trustee for a period of more than 30 consecutive days, upon the Certification of the Trustee of such non-payment, with Notice of the Certification to the debtor(s) and the debtor(s) attorney, if any, the within case shall be dismissed;
 - (d) Other (ie, Counsel Fee Award or other relief to moving party)

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Upon case dismissal/conversion, any funds held by the Chapter 13 Trustee from payments made on account of debtor(s) Plan, shall be disbursed to the Debtor(s), except as follows:

- (a) \$ _____ shall be disbursed to Debtor(s) Counsel for Counsel Fees and Costs hereby allowed as an Administrative Expense;
- (b) \$ _____ to _____ (Creditor) for adequate protection payments pursuant to prior Order of the Court.
- (c) Other: _____

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Law Offices of Mark W. Ford, LLC
4 ½ North Broadway, PO Box 110
Gloucester City, NJ 08030
856-456-8811/856-456-8558 (Fax)
Attorney for the debtor

Case No.: 16-11256 MBK
Chapter: 13
Adv. No.: _____
Hearing Date: May 21, 2018
Judge: Michael B. Kaplin

In Re:

Rodney Jose Kelly

CERTIFICATION OF SERVICE

1. I, Linda Smith:

represent _____ in this matter.

am the secretary/paralegal for Mark W. Ford, who represents
Rodney Jose Kelly in this matter.

am the _____ in this case and am representing myself.

2. On April 23, 2018, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below.

1. Notice of Motion for Voluntary Dismissal
2. Certification
3. Proposed Order
4. Certificate of Service

3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date: 4/23/18

/s/ Linda M. Smith
Signature



Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Albert Russo Standing Trustee CN 4853 Trenton, NJ 08650-4853	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other Email (As authorized by the Court or by rule. Cite the rule if applicable.)
List of Creditors		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other (As authorized by the Court or by rule. Cite the rule if applicable.)

Label Matrix for local noticing 0312-3 Case 16-11256-MBK District of New Jersey Trenton Sat Apr 21 19:33:40 EDT 2018	U.S. Bankruptcy Court 402 East State Street Trenton, NJ 08608-1507	AmeriCredit Financial Services, Inc. dba GM P O Box 183853 Arlington, TX 76096-3853
E*Trade Bank c/o Specialized Loan Servicing, LLC 8742 Lucent Blvd, Suite 300 Highlands Ranch, Colorado 80129-2386	FGC Commercial Mortgage Finance DBA Fremont Mortgage 175 North Riverview Drive Anaheim, CA 92808-1225	(p) JEFFERSON CAPITAL SYSTEMS LLC PO BOX 7999 SAINT CLOUD MN 56302-7999
GM Financial ATTN: Bankruptcy Department PO Box 183593 Arlington, TX 76096-3593	Harley Davidson Credit Corp. ATTN: Plaza Associates JAF Station PO Box 2769 New York, NY 10116-2769	Harley Davidson Credit Corp. ATTN: Van Ru Credit Corporation 1350 E. Touhy Ave, Suite Number 100E Des Plaines, IL 60018-3303
Harley-Davidson Credit Corp. PO Box 9013 Addison, TX 75001-9013	MIDLAND FUNDING LLC PO Box 2011 Warren, MI 48090-2011	OneMain Financial Bankruptcy Department PO Box 140489 Irving, TX 75014-0489
OneMain Financial PO Box 70911 Charlotte, NC 28272-0911	Pep Boys ATTN: Bankruptcy Department 3111 West Allegheny Avenue Philadelphia, PA 19132-1116	(p) PORTFOLIO RECOVERY ASSOCIATES LLC PO BOX 41067 NORFOLK VA 23541-1067
Rushmore Services Center PO Box 5508 Sioux Falls, SD 57117-5508	Sprint ATTN: Allied Interstate PO Box 361474 Columbus, OH 43236-1474	(p) SPRINT NEYTEL CORRESPONDENCE ATTN BANKRUPTCY DEPT PO BOX 7949 OVERLAND PARK KS 66207-0949
Synchrony Bank c/o of Recovery Management Systems Corp 25 S.E. 2nd Avenue, Suite 1120 Miami, FL 33131-1605	Willingboro Township ATTN: Tax Collector 1 Dr. M L King Jr Drive Willingboro, NJ 08046-2853	Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853
Mark W Ford Law Office of Mark W. Ford, LLC P.O. Box 110 4 1/2 North Broadway Gloucester City, NJ 08030-0110	Rodney Jose Kelly 9 Spindletop Lane Willingboro, NJ 08046-1416	

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Fingerhut ATTN: Jefferson Capital Systems 16 McLeland Road St. Cloud, MN 56303-2198	(d) Jefferson Capital Systems LLC Po Box 7999 Saint Cloud Mn 56302-9617	Portfolio Recovery Associates, LLC c/o Capital One Bank (USA), N.A. POB 41067 Norfolk VA 23541
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Sprint
Attn Bankruptcy Dept
PO Box 7949
Overland Park KS 66207-0949

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) WELLS FARGO BANK, N.A., AS TRUSTEE FOR CAR	(u) WELLS FARGO BANK, N.A., AS TRUSTEE FOR CAR FEIN, SUCH, KAHN & SHEPARD, P.C.	End of Label Matrix
		Mailable recipients 22
		Bypassed recipients 2
		Total 24